

EXHIBIT 15



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Transcript of Nieshia Williams

Date: July 28, 2022

Case: Timbers -v- Telligent Masonry, LLC, et al.

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<p>17</p> <p>1 be -- did any of his work have to be torn down and 2 redone?</p> <p>3 A Yes.</p> <p>4 Q Who did the tearing down and the redoing 5 of it?</p> <p>6 A It was other masons. I don't recall their 7 specific names.</p> <p>8 Q Did you have any conversations with 9 Mr. Timbers about the neatness of his work?</p> <p>10 A No.</p> <p>11 Q Why?</p> <p>12 A Because I was not the only Foreman on site 13 when Mr. Timbers was there.</p> <p>14 Q So do you know if any other Foremen had 15 conversations with Mr. Timbers at this site about 16 the neatness of his work?</p> <p>17 A I don't know.</p> <p>18 Q You never had a conversation with 19 Mr. Timbers about the neatness of his work at that 20 site?</p> <p>21 A No.</p> <p>22 Q Did you personally see the work that he</p>	<p>19</p> <p>1 photographs that you provided Tia Taylor at a 2 later point in time.</p> <p>3 Are you the person who took those 4 photographs?</p> <p>5 A Yes.</p> <p>6 Q When did you take those photographs?</p> <p>7 A It would have been in June of 2019. 8 Between May and June of 2019. In realtime I take 9 photos.</p> <p>10 Q What did you do with the photographs of 11 Mr. Timbers' work after you took the photographs?</p> <p>12 A They're probably still on the phone.</p> <p>13 Q Did you send those to anybody -- at the 14 time in 2019 did you send those to anybody at 15 Telligent?</p> <p>16 A No.</p> <p>17 Q You just took them and kept them?</p> <p>18 A I take photos of all work at all sites at 19 all times.</p> <p>20 Q But regularly you don't send that to 21 anybody else at Telligent?</p> <p>22 A No, it's always just documented for my</p>
<p>18</p> <p>1 performed at the site?</p> <p>2 A Yes.</p> <p>3 Q Did you order the work that he did at the 4 site to be torn down and redone?</p> <p>5 A Yes.</p> <p>6 Q And you believe you told other masons 7 that?</p> <p>8 A Other masons what?</p> <p>9 Q To do that work.</p> <p>10 A Yes, that's the only way it could get done 11 if I told other masons.</p> <p>12 Q I'm saying did you or one of the other 13 masons order the -- did you or one of the other 14 Foremen order the masons to tear down the work?</p> <p>15 A At that point in time in which the work 16 was torn down, the other Foreman that was on site 17 when Mr. Timbers was there was no longer at the 18 site.</p> <p>19 Q So who ordered the masons to redo Timbers' 20 work?</p> <p>21 A I did.</p> <p>22 Q We'll come to it later but there's some</p>	<p>20</p> <p>1 records so I know of the work.</p> <p>2 Q So as we indicated, you didn't have any 3 conversations with Mr. Timbers about the neatness 4 of his work at that site, correct?</p> <p>5 A No, I did not.</p> <p>6 Q Did you talk with anybody else about the 7 neatness of Mr. Timbers' work at that site?</p> <p>8 A Yes.</p> <p>9 Q Who did you talk with?</p> <p>10 A The other Foreman that was leading the 11 work on that site.</p> <p>12 Q And what did you tell him if you can 13 recall?</p> <p>14 A I concurred with his observations or I 15 should say his conclusion that the work was not up 16 to par.</p> <p>17 Q So is he the one who brought the work to 18 your attention?</p> <p>19 A Yes.</p> <p>20 Q Did any issues about the -- other than 21 talking to the Foreman did you talk to anybody 22 else about the neatness of Mr. Timbers' work?</p>

<p>25</p> <p>1 A Yes.</p> <p>2 Q And that the overall philosophy if someone</p> <p>3 is not doing a good job is to train them and</p> <p>4 continue to try to make them better; is that</p> <p>5 correct?</p> <p>6 A Yes.</p> <p>7 Q So is there anything that you're aware of</p> <p>8 being said to Mr. Timbers about how he should</p> <p>9 improve?</p> <p>10 Did you have any conversations with</p> <p>11 Mr. Timbers about that?</p> <p>12 A No.</p> <p>13 Q Are you aware if any of the other Foremen</p> <p>14 at this particular job site had any such</p> <p>15 discussions with Mr. Timbers?</p> <p>16 A I don't recall.</p> <p>17 Q Is it usual or unusual for masons to kind</p> <p>18 of come and go? They'll be there for a period of</p> <p>19 time and then they may go off to another job at</p> <p>20 some other company and then come back at</p> <p>21 Telligent?</p> <p>22 A Yes.</p>	<p>27</p> <p>1 A Exactly.</p> <p>2 Q But do you recall being told by anyone</p> <p>3 that a particular mason had been terminated?</p> <p>4 A No, because I'm not in H.R.</p> <p>5 Q It doesn't matter why. I'm just saying</p> <p>6 did anybody ever say to you hey, by the way X has</p> <p>7 been terminated?</p> <p>8 A There would be as far as a companywide</p> <p>9 e-mail to be sent to all Foremen do not allow this</p> <p>10 person on site because they have been terminated</p> <p>11 from the company.</p> <p>12 Q And how many times in the time that you've</p> <p>13 been at Telligent have you gotten that form of</p> <p>14 e-mail?</p> <p>15 A Maybe like three times perhaps.</p> <p>16 Q Would one of those be Mr. Timbers?</p> <p>17 A Probably so. I don't recall. Like I'll</p> <p>18 look and see okay, this person has been terminated</p> <p>19 but if they're not on my site I don't move any</p> <p>20 further as such.</p> <p>21 Q Do you have any specific knowledge of</p> <p>22 any -- any of the people that you got the e-mail</p>
<p>26</p> <p>1 Q That's not unusual, is it?</p> <p>2 A No.</p> <p>3 Q If somebody does that and they come back</p> <p>4 you put them to work, right?</p> <p>5 A No, that's up to the office to allow them</p> <p>6 to be hired again.</p> <p>7 Q So you're not involved -- the Foremen are</p> <p>8 not involved in any of the hiring and firing</p> <p>9 procedures?</p> <p>10 A No, we don't have the final say so.</p> <p>11 Q Do you have the ability to terminate a</p> <p>12 mason?</p> <p>13 A No, we don't have the final say so. A</p> <p>14 recommendation.</p> <p>15 Q In your experience at Telligent for the</p> <p>16 years you've been there, how many instances are</p> <p>17 you aware of in which a mason has been terminated?</p> <p>18 A A mason probably -- I just didn't see them</p> <p>19 so I'm not aware specifically which one has been</p> <p>20 terminated.</p> <p>21 Q In other words, there was some masons that</p> <p>22 were there and then they weren't there?</p>	<p>28</p> <p>1 about being terminated where you know the</p> <p>2 circumstances for the termination?</p> <p>3 A No.</p> <p>4 Q Let me ask the question this way.</p> <p>5 You said about three times you've gotten</p> <p>6 e-mails saying don't use this person if they show</p> <p>7 up, correct?</p> <p>8 A Because they've been terminated.</p> <p>9 Q Correct. So in any of those three</p> <p>10 instances did you know anything about the</p> <p>11 circumstances for why the person was being</p> <p>12 terminated?</p> <p>13 A No.</p> <p>14 Q Did you ever recommend that anybody be</p> <p>15 terminated?</p> <p>16 A No, I've never had to get to the point</p> <p>17 where I've had to recommend.</p> <p>18 Q I should have asked this at the beginning.</p> <p>19 Do you have mason experience?</p> <p>20 A From a theoretical point of view I do.</p> <p>21 Q You never actually worked as a mason?</p> <p>22 A In theory. Only in theory. Not</p>

37

1 Q But you participated in it?

2 **A Yes.**

3 Q Do you know who else was in that meeting?

4 **A It was -- Kenneth Fisher was there, Jose**

5 **Valladares, Tranquilino. I think Michael Pappas**

6 **was there, Chris Pappas.**

7 Q Was Ms. Taylor there?

8 **A I thought there was a gentleman, a**

9 **Caucasian gentleman that was there. I don't**

10 **recall Ms. Taylor being there. She might have**

11 **been there. I remember a Caucasian gentleman**

12 **being there.**

13 MR. TOLAND: Can we go off the record for

14 a second?

15 (Discussion off the record.)

16 BY MR. TOLAND:

17 Q I just want to make sure. As far as

18 you're aware there was no attorney at that

19 meeting, correct?

20 **A No.**

21 Q You don't know who the Caucasian gentleman

22 was?

38

1 **A He was someone -- I just don't know his**

2 **specific title.**

3 Q Were any other Foremen there?

4 **A Jose Valladares and Kenneth Fisher.**

5 Q And you?

6 **A Yes.**

7 Q Do you know what the purpose of the

8 meeting was? Do you know why the meeting

9 happened?

10 **A I mean I really don't recall. That is the**

11 **answer. Like I know we were called in and we were**

12 **discussing a multitude of topics but specifically**

13 **I don't recall like if there was --**

14 Q This meeting wasn't called just about

15 David Timbers? Was it a meeting and Timbers was

16 one of the things discussed or was it called

17 specifically because of David Timbers?

18 **A I was a general meeting that we were**

19 **having. Like I don't recall anything beyond that.**

20 **He did come up in the conversation.**

21 Q The General Superintendent indicated that

22 he has meetings on Tuesdays with the

39

1 Superintendents.

2 Was this one of those meetings or was this

3 scheduled for some specific purpose?

4 **A That I don't know if it was scheduled for**

5 **a specific purpose but it was not a Superintendent**

6 **meeting because I'm not a Superintendent.**

7 Q You could have been getting a promotion

8 and not know it.

9 Were issues other than David Timbers

10 discussed at this meeting?

11 **A Yes.**

12 Q And how long was this meeting?

13 **A It probably was about an hour because we**

14 **had --**

15 Q Do you know how much of the meeting

16 involved David Timbers?

17 **A No, he was just one of the topics.**

18 Q Do you know how long the discussion about

19 David Timbers lasted?

20 **A No.**

21 Q At some point someone asked you if you had

22 any information about the quality of Mr. Timbers'

40

1 work, correct?

2 **A Do I document all of --**

3 Q At some point someone asked you whether

4 you had any information about the quality of

5 Mr. Timbers' work, correct?

6 **A Specifically like to what?**

7 Q Quality of his work.

8 **A When you say do I have any information**

9 **what are you specifically asking?**

10 Q Let me back it up this way. At some point

11 as we know it appears to be the --

12 **A On the 19th?**

13 Q From the photographs that you forwarded to

14 Ms. Tia you did that for a reason so what caused

15 you to --

16 **A She asked me for them.**

17 Q And she asked you via this e-mail, not at

18 that meeting?

19 **A Right, via this e-mail.**

20 Q But you had had -- the e-mail suggests

21 that you had some discussion with her that you had

22 photographs so this seems like Ms. Taylor knew

<p>45</p> <p>1 A Right.</p> <p>2 Q So you would have maybe raised that</p> <p>3 incident then?</p> <p>4 A Yes.</p> <p>5 Q But not prior to that time?</p> <p>6 A No, because he was not -- he wasn't on</p> <p>7 my -- I had no responsibility for him.</p> <p>8 Q The photographs that you shared in</p> <p>9 February of 2021 you didn't share with anyone</p> <p>10 prior to February of 2021, did you?</p> <p>11 A No, because I don't forward -- it might</p> <p>12 have been forwarded to the GC but I take photos of</p> <p>13 all work on all sites that I do for my record</p> <p>14 purposes so would have to check and to confer with</p> <p>15 the general contractor.</p> <p>16 Q But you don't recall sending these</p> <p>17 photographs to anyone at Telligent prior to</p> <p>18 February of 2021?</p> <p>19 A No.</p> <p>20 Q Let's go back. I want to make sure I</p> <p>21 understand this.</p> <p>22 This particular work that Timbers did at</p>	<p>47</p> <p>1 Mr. Valladares?</p> <p>2 A No.</p> <p>3 MR. TOLAND: That's all I have.</p> <p>4 MR. DeGENNARO: Do you want to take a</p> <p>5 little break?</p> <p>6 THE WITNESS: No, I'm good.</p> <p>7 MR. DeGENNARO: Ms. Glover, do you want to</p> <p>8 go first and then I'll ask any questions in light</p> <p>9 of your questions and Mr. Toland's?</p> <p>10 MS. GLOVER: That's fine.</p> <p>11 EXAMINATION BY COUNSEL FOR THE DEFENDANT</p> <p>12 BY MS. GLOVER:</p> <p>13 Q Excuse me, can you pronounce your name for</p> <p>14 me so I can say it correctly?</p> <p>15 A Sure, Nieshia Williams.</p> <p>16 Q Ms. Williams, my name is Alana Glover.</p> <p>17 I'm the attorney today on behalf of Ms. Tia</p> <p>18 Taylor. I just had a few follow-up questions for</p> <p>19 you.</p> <p>20 First question I have is we briefly</p> <p>21 discussed the employee handbook. Do you recall</p> <p>22 receiving the employee handbook at some point in</p>
<p>46</p> <p>1 this particular site at that particular time in</p> <p>2 2019, did you have any conversations prior to this</p> <p>3 February 2021 meeting with anyone about the</p> <p>4 quality of his work?</p> <p>5 A Yes.</p> <p>6 Q So who did you talk to and when?</p> <p>7 A The lead Foreman, Kenneth Fisher.</p> <p>8 Q At the time?</p> <p>9 A Yeah, Kenneth Fisher who was the lead</p> <p>10 Foreman.</p> <p>11 Q Other than that conversation you didn't</p> <p>12 talk with anybody else at Telligent about it?</p> <p>13 A No, because I was not the lead Foreman.</p> <p>14 Q Do you know if Kenneth Fisher talked with</p> <p>15 anybody else about the quality -- any of the</p> <p>16 Superintendents or anybody at Telligent corporate</p> <p>17 about David Timbers' work?</p> <p>18 A I don't know.</p> <p>19 Q Just circle back and we're coming towards</p> <p>20 the end here.</p> <p>21 You're not aware of any -- you never heard</p> <p>22 anything about David Timbers threatening</p>	<p>48</p> <p>1 time when you began your employment with</p> <p>2 Telligent?</p> <p>3 A At the start, no, not at the initial start</p> <p>4 but I do have an employee handbook.</p> <p>5 Q Is it your understanding that all</p> <p>6 employees of Telligent are bound by that handbook?</p> <p>7 A Yes.</p> <p>8 Q And I just briefly want to talk to you</p> <p>9 about Tia Taylor.</p> <p>10 Can you explain to me what you generally</p> <p>11 know about Tia Taylor if you have ever met her in</p> <p>12 person before?</p> <p>13 A If I can recall, once I was introduced to</p> <p>14 her I believe she was the head of Human Resources.</p> <p>15 Q And around what time were you introduced</p> <p>16 to Ms. Tia Taylor?</p> <p>17 A It would have been -- I believe in 2020 so</p> <p>18 around August of 2020.</p> <p>19 Q Do you recall -- go ahead.</p> <p>20 A I believe around August of 2020.</p> <p>21 Q And when you initially met her in August</p> <p>22 of 2020 what was that introduction? Did you reach</p>

<p style="text-align: right;">57</p> <p>1 mason -- of course there's different skill levels</p> <p>2 but there is an expectation that a certain amount</p> <p>3 of production for whatever is being done -- for</p> <p>4 example, if it was block, 80-block per day for a</p> <p>5 mason, 500 brick for a bricklayer, 20 stone for</p> <p>6 stone but in addition to the production, the</p> <p>7 quality must be on par so it's that production</p> <p>8 with quality and the quality includes, you know,</p> <p>9 plumb, mortar joints, to measurement.</p> <p>10 Q And there were occasions when Mr. Timbers'</p> <p>11 work did not meet that standard of quality?</p> <p>12 A Yes.</p> <p>13 Q And it would have to be torn down and</p> <p>14 rebuilt?</p> <p>15 A Yes.</p> <p>16 Q Was that on more than one occasion?</p> <p>17 A When you say "on more than one occasion"</p> <p>18 what do you mean? There was more than one</p> <p>19 location in which he worked?</p> <p>20 Q Was it a single instance when his work had</p> <p>21 to be rebuilt or was it on more than one occasion</p> <p>22 when he built something it did not meet the</p>	<p style="text-align: right;">59</p> <p>1 Q Consistently failed to show up.</p> <p>2 A So there's verbal warnings before there's</p> <p>3 a formal written warning.</p> <p>4 Q And if that employee consistently failed</p> <p>5 to show up and then they subsequently showed up,</p> <p>6 would you deny David Timbers work for that reason?</p> <p>7 A I would but that would be after going</p> <p>8 through the proper channels, giving the verbal</p> <p>9 warning and then giving the written warning then</p> <p>10 that would be the case.</p> <p>11 Q There was prior testimony regarding the</p> <p>12 use of the word "termination" and whether or not</p> <p>13 you terminate an employee or a mason.</p> <p>14 Are there opportunities when you simply</p> <p>15 decide not to give that mason work at your job</p> <p>16 site as a Foreman?</p> <p>17 A As a Foreman you don't have the authority</p> <p>18 not to but we can recommend to a Superintendent</p> <p>19 this has occurred so what would you like to do but</p> <p>20 that's after. Like I said, you have a verbal and</p> <p>21 then you formally write so if the mason was -- I</p> <p>22 mean when they sign that they've been formally</p>
<p style="text-align: right;">58</p> <p>1 standards and then it had to be torn down and</p> <p>2 rebuilt?</p> <p>3 A For myself just once at that site, that</p> <p>4 section in which he did.</p> <p>5 Q And was he aware of this occurring, that</p> <p>6 the work had not met the quality standard and it</p> <p>7 had to be rebuilt?</p> <p>8 A I don't know.</p> <p>9 Q Circling back to timeliness, one of the</p> <p>10 other expectation, was timeliness an issue with</p> <p>11 Mr. Timbers?</p> <p>12 A Yes.</p> <p>13 Q How so?</p> <p>14 A Arriving to work on time and on a</p> <p>15 consistent basis.</p> <p>16 Q And you testified that arriving on a</p> <p>17 consistent basis and without having -- if you were</p> <p>18 absent there would be an excuse or a reason for</p> <p>19 it.</p> <p>20 If there was not an excuse or a reason for</p> <p>21 it what would happen?</p> <p>22 A If the employee did not --</p>	<p style="text-align: right;">60</p> <p>1 written up and if they were to show then it's</p> <p>2 taken up between the Superintendent and Human</p> <p>3 Resources. You don't handle what occurs post</p> <p>4 that.</p> <p>5 Q Do you have Exhibit 1 in front of you, the</p> <p>6 pictures? Flip through this very briefly but I'm</p> <p>7 sure you remember it because we talked about it a</p> <p>8 half an hour ago.</p> <p>9 Can you describe the quality of the work</p> <p>10 in that picture?</p> <p>11 A What you see here is basically a lot of --</p> <p>12 the mortar that they use to apply the block, it's</p> <p>13 all over the brick so one of the -- as a seasoned</p> <p>14 mason that's something that you wouldn't see is</p> <p>15 mortar all over the block because therefore that</p> <p>16 incurs more cost on Telligent because we have to</p> <p>17 go through and scrape the mortar off because</p> <p>18 that's -- this isn't a finished product for the</p> <p>19 general contractor.</p> <p>20 Q Would you describe that as poor quality?</p> <p>21 A Poor quality.</p> <p>22 Q Does that not meet Telligent's</p>

<p>61</p> <p>1 expectations?</p> <p>2 A No, it does not.</p> <p>3 Q Would that be work that would have to be</p> <p>4 redone?</p> <p>5 A This is scrape work that has to be redone</p> <p>6 when it's -- no.</p> <p>7 Q Would it be corrected at some point?</p> <p>8 A Yes.</p> <p>9 Q Going back to the incident with the</p> <p>10 elderly couple showing up at the job site, can you</p> <p>11 describe that incident? What happened?</p> <p>12 MR. TOLAND: Objection.</p> <p>13 BY MR. DeGENNARO:</p> <p>14 Q You can answer.</p> <p>15 A I wasn't there. It's just that it was</p> <p>16 brought to my attention later on in the day</p> <p>17 because again, they got stopped by the security at</p> <p>18 TSA or the security checkpoint at TSA and it was</p> <p>19 brought to my attention when I was leaving for the</p> <p>20 day that an elderly couple showed up looking for a</p> <p>21 check that David Timbers said that he left for</p> <p>22 them and because of the fact that it's a secured</p>	<p>63</p> <p>1 chiseled and corrected?</p> <p>2 A Yes.</p> <p>3 Q And during the time he was there -- you</p> <p>4 take photographs of lots of stuff, correct?</p> <p>5 A Uh-huh.</p> <p>6 Q Yes or no?</p> <p>7 A Yes, I apologize.</p> <p>8 Q You were doing so good.</p> <p>9 Those are the only photographs you</p> <p>10 submitted to Telligent about bad work by</p> <p>11 Mr. Timbers, correct?</p> <p>12 A Yes.</p> <p>13 Q Presumably if you had more photographs of</p> <p>14 bad work by him you would have documented it,</p> <p>15 correct?</p> <p>16 A Yes.</p> <p>17 Q And this is all that you sent to</p> <p>18 Ms. Taylor, correct?</p> <p>19 A Yes.</p> <p>20 Q Did you give any verbal warning to</p> <p>21 Mr. Timbers about the work he did here?</p> <p>22 A No.</p>
<p>62</p> <p>1 site, they had a roster of who has authorization</p> <p>2 to enter the site so Ms. Ann who was working for</p> <p>3 the general contractor was able to look up and say</p> <p>4 he's not even -- he's not at the site so there's</p> <p>5 nothing here for you and the elderly couple</p> <p>6 departed.</p> <p>7 Once I was told of that I was kind of</p> <p>8 flabbergasted since he did not work there. His</p> <p>9 brother actually was working for me at the moment,</p> <p>10 Anthony Timbers and when I told him of -- that an</p> <p>11 old couple came looking for his brother he just</p> <p>12 said oh, he scammed them again.</p> <p>13 Q Did Anthony Timbers say anything else</p> <p>14 beyond that that you recall?</p> <p>15 A No.</p> <p>16 MR. DeGENNARO: I have no other questions.</p> <p>17 EXAMINATION BY COUNSEL FOR THE DEFENDANT</p> <p>18 BY MR. TOLAND:</p> <p>19 Q Looking at the -- I do. Just a couple.</p> <p>20 Just so we're clear, relative to the work</p> <p>21 that was done there that brick didn't need to be</p> <p>22 torn down and redone. It needed to basically be</p>	<p>64</p> <p>1 Q Therefore, you didn't do any formal</p> <p>2 written write-up about the work that he did here?</p> <p>3 A No.</p> <p>4 Q You mentioned about timeliness on his</p> <p>5 part.</p> <p>6 Did you ever give a verbal warning to</p> <p>7 Mr. Timbers about timeliness?</p> <p>8 A No.</p> <p>9 Q Did you ever do a formal write-up for</p> <p>10 Mr. Timbers about timeliness?</p> <p>11 A No.</p> <p>12 Q Looking at Exhibit 2 if we may and turning</p> <p>13 to the second page of that, just so we're clear</p> <p>14 the incident with the older couple that showed up</p> <p>15 at the NSA job site, correct?</p> <p>16 A TSA.</p> <p>17 Q I'm sorry, TSA job site, Mr. Timbers was</p> <p>18 not working at that site for you in January of</p> <p>19 2020, correct?</p> <p>20 A No.</p> <p>21 Q And all the information that you received</p> <p>22 about that incident came from the representative</p>